

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Central District of IllinoisUnited States of America
v.

JOHN DOE #4

Defendant

Case No. 14-20048-04

1:14MJ -646

FILED
OCT 17 2014
A TRUE COPY
ATTEST
KENNETH A. WELLS, CLERK
BY: *[Signature]*
DEPUTY CLERK
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
DATE: 10/9/2014

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JOHN DOE #4,
who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count 1: Child Exploitation Enterprise in violation of 18 U.S.C. § 2252A(g)

Count 2: Conspiracy to Advertise Child Pornography in violation of 18 U.S.C. § 2251(d)(1)(A) and (e)

Count 3: Conspiracy to Distribute Child Pornography in violation of 18 U.S.C. § 2252(a)(2) and (b)(1)

Date: 10/07/2014

[Signature]
Issuing officer's signature

City and state: Urbana, IL

DAVID G. BERNTHAL, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

Thursday, 09 October, 2014 10:30:02 AM
Clerk, U.S. District Court, ILCD

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
BRIAN W. DAVIS,)
f.k.a. JOHN DOE #1)
a.k.a. "[REDACTED]")
a.k.a. "[REDACTED]")
a.k.a. "[REDACTED]")
)
ANDREW D. HOFF,)
f.k.a. JOHN DOE #2)
a.k.a. "[REDACTED]")
)
DAVID DELALIO,)
f.k.a. JOHN DOE #3)
a.k.a. "[REDACTED]")
)
JOHN DOE #4)
a.k.a. "[REDACTED]" and)
)
JOHN DOE #5)
a.k.a. "[REDACTED]")
)
Defendants.)

1:14MJ-646

Case No. 14-CR-20048

VIO: 18 U.S.C. § 2252A(g)

18 U.S.C. §§ 2251(d)(1)(A) and (e)

18 U.S.C. §§ 2252(a)(2) and (b)(1)

18 U.S.C. §§ 2251(a) and (e)

18 U.S.C. § 2253

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Child Exploitation Enterprise)

Between on or about May 12, 2012, and on or about October 7, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"
ANDREW D. HOFF f.k.a. JOHN DOE #2 a.k.a. "[REDACTED]"
DAVID DELALIO f.k.a. JOHN DOE #3 a.k.a. "[REDACTED]"
JOHN DOE #4 a.k.a. "[REDACTED]" and
JOHN DOE #5 a.k.a. "[REDACTED]"

defendants herein, with others known and unknown to the Grand Jury, did knowingly engage in a child exploitation enterprise, that is, BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" ANDREW D. HOFF f.k.a. JOHN DOE #2 a.k.a. "[REDACTED]" DAVID DELALIO f.k.a. JOHN DOE #3 a.k.a. "[REDACTED]" JOHN DOE #4 a.k.a. "[REDACTED]" and JOHN DOE #5 a.k.a. "[REDACTED]" violated Chapter 110 of Title 18 of the United States Code, as a part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, and committed those offenses in concert with three or more other persons, as more fully described below:

THE ENTERPRISE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] For purposes of this indictment, the term "child pornography" is as defined in Title 18, United States Code, Section 2256(8)(a).

PREDICATE OFFENSES

On or about the below-listed dates, in the Central District of Illinois and elsewhere, BRIAN W. DAVIS f.k.a JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

On or about the below-listed dates, in the Central District of Illinois and elsewhere, BRIAN W. DAVIS f.k.a JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

a.k.a. "[REDACTED] ANDREW D. HOFF f.k.a JOHN DOE #2 a.k.a. "[REDACTED] DAVID DELALIO f.k.a JOHN DOE #3 a.k.a. "[REDACTED] JOHN DOE #4 a.k.a. "[REDACTED] and JOHN DOE #5 a.k.a. "[REDACTED] defendants herein, acting in concert with each other and others known and unknown to the Grand Jury, engaged in a series of three or more felony violations of Title 18, United States Code, Section 2251(d)(1)(A), that is, the advertisement of child pornography, and violations of Title 18, United States Code, Section 2252(a)(2), that is, the distribution of child pornography, [REDACTED]
[REDACTED]
[REDACTED] constituting three or more separate incidents and involving more than one victim, as follows:

User	Dates
[REDACTED] a.k.a. [REDACTED] a.k.a. [REDACTED]	December 25, 2013 January 30, 2014 March 5, 2014 May 5, 2014
[REDACTED]	October 21, 2013 November 8, 2013 January 30, 2014 February 4, 2014
[REDACTED]	December 16, 2013 February 5, 2014 February 10, 2014 May 19, 2014
[REDACTED]	March 27, 2014 May 17, 2014 July 29, 2014 August 24, 2014
[REDACTED]	January 27, 2014 February 1, 2014 April 27, 2014 June 21, 2014

All in violation of Title 18, United States Code, Section 2252A(g).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT TWO

(Conspiracy to Advertise Child Pornography)

Between on or about May 12, 2012, and on or about October 7, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"
ANDREW D. HOFF f.k.a. JOHN DOE #2 a.k.a. "[REDACTED]"
DAVID DELALIO f.k.a. JOHN DOE #3 a.k.a. "[REDACTED]"
JOHN DOE #4 a.k.a. "[REDACTED]" and
JOHN DOE #5 a.k.a. "[REDACTED]"

defendants herein, did knowingly conspire to make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

COUNT THREE
(Conspiracy to Distribute Child Pornography)

Between on or about May 12, 2012, and on or about October 7, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"
ANDREW D. HOFF f.k.a. JOHN DOE #2 a.k.a. "[REDACTED]"
DAVID DELALIO f.k.a. JOHN DOE #3 a.k.a. "[REDACTED]"
JOHN DOE #4 a.k.a. "[REDACTED]" and
JOHN DOE #5 a.k.a. "[REDACTED]"

defendants herein, did knowingly conspire to distribute a visual depiction using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT FOUR

(Advertising Child Pornography)

On or about December 25, 2013, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

defendant herein, did knowingly make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

COUNT FIVE
(Advertising Child Pornography)

On or about January 30, 2014, in the Central District of Illinois and elsewhere,
BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"

defendant herein, did knowingly make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

COUNT SIX
(Advertising Child Pornography)

On or about March 5, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

defendant herein, did knowingly make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

COUNT SEVEN
(Advertising Child Pornography)

On or about May 5, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"

defendant herein, did knowingly make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

COUNT EIGHT

(Distribution of Child Pornography)

On or about December 25, 2013, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"

defendant herein, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT NINE
(Distribution of Child Pornography)

On or about January 30, 2014, in the Central District of Illinois and elsewhere,
BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"
defendant herein, did knowingly distribute a visual depiction using any means and
facility of interstate and foreign commerce and in and affecting interstate and foreign
commerce, by any means including by computer, where the production of such visual
depiction involved the use of a minor engaging in sexually explicit conduct, as defined
in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such
conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT TEN
(Distribution of Child Pornography)

On or about March 5, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"

defendant herein, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT ELEVEN
(Distribution of Child Pornography)

On or about May 5, 2014, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a.
"[REDACTED]"

defendant herein, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT TWELVE
(Sexual Exploitation of a Child)

On or about January 1, 2007 or before, through on or about May 13, 2014, in the Central District of Illinois, and elsewhere,

BRIAN W. DAVIS a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, the defendant knowing and having reason to know that said visual depiction would be transmitted using any means and facility of interstate and foreign commerce, and said visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and said visual depiction was actually transmitted using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THIRTEEN
(Distribution of Child Pornography)

On or about March 24, 2013, in the Central District of Illinois and elsewhere,

BRIAN W. DAVIS a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"

defendant herein, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A) and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

FORFEITURE NOTICE

1. The charges contained in Counts One, Two, and Three are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. For their engagement in the violations alleged in Counts One, Two, and Three, the defendants,

BRIAN W. DAVIS f.k.a. JOHN DOE #1 a.k.a. "[REDACTED]" a.k.a. "[REDACTED]" a.k.a. "[REDACTED]"
ANDREW D. HOFF f.k.a. JOHN DOE #2 a.k.a. "[REDACTED]"
DAVID DELALIO f.k.a. JOHN DOE #3 a.k.a. "[REDACTED]"
JOHN DOE #4 a.k.a. "[REDACTED]" and
JOHN DOE #5 a.k.a. "[REDACTED]"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all interest in:

a. Any visual depictions or other matter containing such visual depictions which were produced, transported, mailed, shipped, received, or possessed as alleged in Counts One, Two, and Three of this Indictment;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses alleged in Counts One, Two, and Three of this Indictment; and

c. Any property, real or personal, used or intended to be used to commit or promote the commission of the offenses alleged in Counts One, Two, and Three of this Indictment.

3. The property referenced in paragraph 2, subparagraphs a, b, and c above

includes, but is not limited to, video recorders and accessories, cameras, computer hardware, such as monitors, central processing units, keyboards, computer programs, software, computer storage devices, such as disk drive units, disks, tapes, hard disk drives/units, peripherals, modems and other telephonic and acoustical equipment, printers, contents of memory data contained in and through the aforementioned hardware and software, tools, equipment, manuals and documentation for the assembly and use of the aforementioned hardware and software.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL,

s/Foreperson

FOREPERSON

s/John Childress

JAMES A. LEWIS
UNITED STATES ATTORNEY
EMP/KAB